

1 Keith Mathews  
2 *Pro Hac Vice*  
3 Associated Attorneys of New England  
4 PO Box 278  
5 Manchester, NH 03105  
6 Ph. 603-622-8100  
7 keith@aaone.law

8 Daniel de Souza Clasen  
9 3746 Foothill Boulevard, Suite 1132  
10 Glendale, CA 91214  
11 (747) 221-4144

12 *Attorneys for Coronavirus Reporter*  
13 *and Calid Inc.*

14 GIBSON, DUNN & CRUTCHER LLP  
15 MARK A. PERRY (SBN 212532)  
16 mperry@gibsondunn.com  
17 RACHEL S. BRASS (SBN 219301)  
18 rbrass@gibsondunn.com  
19 555 Mission Street, Suite 3000  
20 San Francisco, CA 94105-0921  
21 Telephone: (415) 393-8200  
22 Facsimile: (415) 374-8429

23 *Attorneys for Defendant Apple Inc.*

24 **UNITED STATES DISTRICT COURT**  
25 **NORTHERN DISTRICT OF CALIFORNIA**  
26 **SAN FRANCISCO DIVISION**

27 CORONAVIRUS REPORTER, CALID INC.,  
28 on behalf of themselves and all others similarly  
situated

Plaintiffs,

v.

APPLE INC.,

Defendant.

CASE NO. 3:21-cv-05567-EMC

**STIPULATION AND [PROPOSED] ORDER  
REGARDING BRIEFING SCHEDULE  
RELATING TO PLAINTIFFS' MOTION  
FOR PRELIMINARY INJUNCTION AND  
DEFENDANT'S MOTION TO DISMISS**

Honorable Edward M. Chen

1 NOW COME, The Parties, by and through counsel and hereby agree as follows:

2 This Stipulation is hereby entered into by and between Plaintiffs Coronavirus Reporter and  
3 Calid Inc. (“Plaintiffs”) and Defendant Apple Inc. (“Apple”, together with Plaintiffs, the “Parties”).

4 WHEREAS, Plaintiffs filed their complaint in this action on July 20, 2021 (ECF No. 1);

5 WHEREAS, Plaintiffs filed their Motion for Preliminary Injunction on August 8, 2021 (ECF  
6 No. 20);

7 WHEREAS, on August 11, 2021, the Court granted Apple’s Motion to Extend Time to Respond  
8 to the Complaint to August 23, 2021, to make it contemporaneous to filing its response to Plaintiffs’  
9 Motion for Preliminary Injunction (ECF No. 29);

10 WHEREAS, on August 23, 2021, Apple filed its Opposition to Plaintiffs’ Motion for Prelimi-  
11 nary Injunction and its Motion to Dismiss (ECF Nos. 32, 35);

12 WHEREAS, Plaintiffs’ deadline to respond to Apple’s Opposition to Plaintiffs’ Motion for  
13 Preliminary Injunction is August 30, 2021;

14 WHEREAS, the Parties have conferred regarding the Plaintiffs’ deadline to respond to the Op-  
15 position to Plaintiffs’ Motion for Preliminary Injunction;

16 WHEREAS, no other prior requests to modify the briefing schedules related to the Plaintiffs’  
17 Motion for Preliminary Injunction or Apple’s Motion to Dismiss have been made to the Court;

18 WHEREAS, the Parties have agreed that Plaintiff’s Reply to Defendant Apple Inc.’s Opposi-  
19 tion to Plaintiffs’ Motion For Preliminary Injunction will be due on September 7, 2021.

20 WHEREAS, the Parties have also agreed that Apple’s Reply in Support of its Motion to Dismiss  
21 will be due on September 21, 2021;

22 WHEREAS, the requested relief will not prejudice any party or cause delay.

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IT IS HEREBY STIPULATED AND AGREED by and between the undersigned parties:

1. Plaintiff's Reply to Defendant Apple Inc.'s Opposition to Plaintiffs' Motion For Preliminary Injunction will be due on September 7, 2021; and
2. Apple's Reply in Support of its Motion to Dismiss will be due on September 21, 2021.

DATED: August 28, 2021

ASSOCIATED ATTORNEYS OF NEW ENGLAND

By: /s/ Keith Mathews

Keith Mathews

Associated Attorneys of New England

Keith Mathews

NH Bar No. 20997

PO Box 278

Manchester, NH 03105

Ph. 603-622-8100

keith@aaone.law

Daniel de Souza Clasen

3746 Foothill Boulevard, Suite 1132

Glendale, CA 91214

(747) 221-4144

*Attorneys for Plaintiffs*

DATED: August 28, 2021

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Rachel S. Brass (Keith Mathews with authorization)

Rachel S. Brass

GIBSON, DUNN & CRUTCHER LLP

MARK A. PERRY (SBN 212532)

mperry@gibsondunn.com

RACHEL S. BRASS (SBN 219301)

rbrass@gibsondunn.com

555 Mission Street, Suite 3000

San Francisco, CA 94105-0921

Telephone: (415) 393-8200

Facsimile: (415) 374-8429

*Attorneys for Defendant Apple Inc.*

**[PROPOSED] ORDER**

Pursuant to the Stipulation:

1. Plaintiff's Reply to Defendant Apple Inc.'s Opposition to Plaintiffs' Motion For Preliminary Injunction will be due on September 7, 2021; and
2. Apple's Reply in Support of its Motion to Dismiss will be due on September 21, 2021.

**IT IS SO ORDERED.**

DATED: August \_\_, 2021

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Judge Edward M. Chen  
United States District Judge

**CERTIFICATE OF SERVICE**

I, Keith Mathews, do declare as follows:

I certify that a copy of the foregoing was delivered electronically to counsel for the Defendants with counsel, and emailed to those without known counsel.

Executed on this 28<sup>th</sup> day of August 2021.

/s/ Keith Mathews

Keith Mathews  
Attorney for Plaintiffs